

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION

**Supplement No. 1 to Greg H. Bristol's
Expert Witness Report Dated September 26, 2022**

Prepared by
Greg H. Bristol
Post Office Box 53
Points, West Virginia 25437

in the matter of

Aris Hines & Brandi Thomason, Plaintiffs,
vs
Terry S. Johnson, et al., Defendants
Case No. 1:19-cv-515

Submitted to
M. Anthony Burts II, Esq.
Burts Law PLLC
2520 Sardis Road North, Suite 234
Charlotte, North Carolina 28227

January 16, 2023

TABLE OF CONTENTS

INTRODUCTION.....	3
Background on Expert Report Dated September 26, 2022	3
Expert Report's Scope of Assignment	3
Purpose of Supplemental Report	4
Supplemental Report's Scope of Assignment	4
Expert Unable to Complete Supplemental Report No. 1 by COB 1/16/23	4
TIMELINES.....	5
F-1 VISA ADMiSSION REQUIREMENTS	8
ALAMANCE COUNTY SCHOOLS.....	9
Reaction of School Leaders to EAHS Having to Forfeit Games in 2016.....	9
Reaction of ACSO Officers to EAHS Having to Forfeit Games in 2016.....	10
NEWSPAPER ARTICLES THAT MENTION HINES & HUMAN TRAFFICKING	11
DOCUMENTS REVIEWED BY EXPERT SINCE 9/26/22.....	12
Review ACSO Investigation Report 2016-04-212.....	12
Review ACSO Investigation Report 2016-05-082.....	14
Review Deposition of Stefanie Brown Barfield.....	14
Review Deposition of Sheriff Johnson.....	14
Review Deposition of Sheriff Aundrea M. Azelton	14
ARREST AND SEARCH WARRANT AFFIDAVIT INACCURACIES	15
CONCLUSIONS AND OPINION.....	18
ATTACHMENT A: Documents Received After 9/26/22 (LIST).....	19
ATTACHMENT B: Documents Received After 9/26/22 (DETAILED).....	20
ATTACHMENT C: News Articles That Mention Hines & Human Trafficking	27
ATTACHMENT D: CV	28
ATTACHMENT E: Compensation RATE.....	29

INTRODUCTION

Background on Expert Report Dated September 26, 2022

I am a human trafficking investigations subject matter expert (SME). On July 16, 2022, I was retained by Burts Law PLLC ("Client"), 2520 Sardia Road North, Suite 234, Charlotte, North Carolina, on behalf of the Plaintiffs, as an expert witness ("Expert") on human trafficking. In Plaintiffs' amended complaint, filed on March 6, 2021, they listed the following cause of actions:

- 1) Intentional Infliction of Emotional Distress,
- 2) Malicious Prosecution,
- 3) Abuse of Process, and
- 4) Negligent Infliction of Emotional Distress.

Expert Report's Scope of Assignment

In my expert report, my opinions related to answering the following questions:

1. Did the Plaintiffs violate the Trafficking Victims Protection Act of 2000 (TVPA), TVPA's Reauthorizations, or state human trafficking laws, when they assisted Jonathan Kingsley to travel to the United States to attend school in North Carolina?
2. Did the Defendants falsely represent to the Plaintiffs and the news media that the Plaintiffs had committed a heinous crime bordering on being a member of an international human trafficking ring?

The following were my opinions in my expert report, dated September 26, 2022:

1. There was no evidence in the Alamance County Sheriff Office (ACSO) arrests of Plaintiffs that they were engaged in human trafficking or part of an international human trafficking criminal enterprise.
2. There is evidence to believe that an athletic school booster in Alamance County unethically tried to keep Jonathan Kingsley in the Alamance County High School football program after he moved out of their district.
3. There is evidence to conclude that Defendant(s) falsely represented to the public that Plaintiffs were human traffickers or were part of a human trafficking organization that crossed the United States and went overseas, when they were not human traffickers.

Purpose of Supplemental Report

Subsequent to delivering my expert report to my Client, Client provided me additional documents (49) for review on the following dates:

- October 6, 2022 (1 document)
- October 10, 2022 (30 documents/files)
- December 21, 2022 (15 documents/files)
- December 27, 2022 (1 document)
- January 16, 2023 (2 documents)

Supplemental Report's Scope of Assignment

Client has asked Expert to review the documents produced by the Defendants since September 26, 2022 along with any new depositions and information, and advise if the supplemental information will change my opinion and, if not, explain that answer.

Process Used by Expert to Make Opinion in Supplemental Report

My opinions in this supplemental report are based on the discovery conducted in this case after September 26, 2022, and a review of news articles that mention Plaintiffs. A list of the materials I have reviewed in this matter are listed in Attachments A, B, and C.

My opinions are also based on my experience, education, training, skill, and knowledge in the field of law enforcement human trafficking investigations, as described in my updated Curriculum Vitae, dated January 10, 2023 (Attachment D). I reserve the right to amend this supplemental report should additional information be made available after this report is submitted. Information about my compensation is contained in an Attachment to my expert report, dated September 26, 2022.

Expert Unable to Complete Supplemental Report No. 1 by COB 1/16/23

Attachment A is a list of all documents Expert has received since September 26, 2022. There are 100's of redactions in these documents, and it is taking twice as long to review them as many documents must now be compared to each other in order to understand them.

The two depositions received on January 16, 2023 have not been reviewed, and are important for Expert to review before making a final determination in this matter.

TIMELINES

2014

Under development as of January 16, 2023

(Add Table 1 here)

EXHIBIT 1

2015 (September – December)

Table 2: Timeline September – December 2015		
Date	Activity	See Exhibit
9/01	JK in 9 th grade at EAHS, ¹ Playing H.S. football, becomes a star. Hines living at 401 . Holt Street, Mebane (Alamance Co.) <ul style="list-style-type: none"> 75% of Mebane is in Alamance County (west side) 25% of Mebane is in Orange County (east side) 	Defense 1427733 Defense Hines interview 1.avi
? 10/00	Hines moves to 718 Blue Lake Drive, Mebane (Orange Co.) Getting ready to transfer to Orange High School	Defense Hines interview 1.avi 00:45:00
? 10/15	Hines gets ph call from Coach Kirby and AD George Robinson “We need JK”, you have two options to keep him at EAHS 1) Pay tuition 2) Use a family we know in AC who will enroll JK in EAHS. We did not know the Grate family. Kirby talks to the Grates. We said no to the Grate family but would accept tuition \$. That night, booster Ken Born visits us with a check. We did not know that was improper.	00:45:45 00:46:15 00:46:28 00:47:05 00:47:40
10/20	BT paid \$1,667 to Marion Bynun, ABSS Receptions See Plaintiff Exhibit Receipt No 1181105	00:48:45
10/23	Orange County Schools Out-of-District Release Letter <i>Your request has been approved > EAHS</i> Coach Kirby knew what was going on. Hines: No one informed us that a court order was required. Hines: We thought we were doing everything right.	Plaintiff Exhibit Release Ltr 00:50:15
12/1	CKJ terminated in SEVIS	Federal indictment
12/3	A college coach called this week about JK (per Coach Kirby)	News story 12/3/15
12/3	JK will be a big-time prospect (per Coach Kirby)	News story 12/3/15
12/3	EAHS football team is undefeated	News story
12/30	JK on MaxPreps All-American Team – 1 st Team Defense	
	ABSS Alamance Burlington School System AC Alamance County AD Athletic Director EAHS Eastern Alamance High School	

¹ EAHS Transfer Information Sheet (Plaintiff Exhibit 1427733)

EXHIBIT 1

2016

Under development as of January 16, 2023

(Add Table 3 here)

F-1 VISA ADMISSION REQUIREMENTS

- A valid passport
- A photograph for your visa
- Printed copies of your DS-160 and I-901 SEVIS payment confirmations
- I-20 form
- School transcripts if applicable
- Diploma if applicable
- Proof of finances
- An interview is required at a US Embassy for applicants between the ages of 14 and 79.

Prior to an interview at a US Embassy, the school that the student wants to attend will send them a form I-20 A-B (Certificate of Eligibility), which is used to obtain a F-1 visa from an American consul, or to apply for a change of status.

To maintain a F-1 status in the US, a student must comply with school regulations and code of conduct, as well as with the conditions set out in the F-1 visa requirements.

While in F-1 status, immigration law requires F-1 visa holders to update their US address every time they move.

ALAMANCE COUNTY SCHOOLS

The Alamance-Burlington School System (ABSS) consists of seven high schools, seven middle schools, and 20 elementary schools, in Alamance County, North Carolina. ABSS's Woodlawn Middle School offers interscholastic athletics for 6th – 8th grade students, who meet local and state eligibility requirements.

The Woodland Middle School student handbook states the following regarding sports eligibility:

- 1) Students must be less than 15 years of age on or before October 16 of the current school year. Once a student enters the sixth grade they have six consecutive semesters of eligibility.
- 2) Students must maintain a passing grade in all four core subjects and one elective subject each semester. If a student is academically eligible or ineligible at the beginning of the semester, that status is retained for the entire semester.
- 3) Students must receive a medical examination once every 365 days by a duly licensed physician.

In 2022, the North Carolina Department of Public Instruction offered the public a PowerPoint presentation (23 slides) called *2022-23 Middle School Athletics Player Eligibility*, which states the following:

- 1) It is the responsibility of the school principal to check the academic status of each student/athlete enrolled in school at the beginning and close of a semester (Slide 5).
- 2) The principle must have evidence of the legal birth date of the student (Slide 6).
- 3) School assignment is based on the residence of the parent or legal custodian (Court ordered custody, not guardian) within the administrative unit (Slide 16).

Reaction of School Leaders to EAHS Having to Forfeit Games in 2016

John Kirby – EAHS Football Coach

- *31 years, never been involved in anything like this. You read about it, you feel for other teams going through it, but you don't wish this on anyone.* ²

George Robinson – Alamance County Athletic Director

- *Our kids, this is no fault of them. They work hard, they've been successful and a clerical error by an adult kinda puts you on, I guess the wrong end of it.* ³
- *The school is responsible, and we know that's a tremendous burden to put on the school.* ⁴

² The Time-News, Eastern Alamance forfeits 2015 football victories, almost half of basketball wins, May 5, 2016

³ The Times-News, Eastern Alamance forfeits 2015 football victories, almost half of basketball wins, May 5, 2016

⁴ Ibid.

EXHIBIT 1

- *Basically when we enroll students, we can't take notarized documents. Documents have to be, especially if it's not the biological parent that's enrolling the child, it has to be something court ordered and in this particular situation, the receiving school allowed the child to enroll...with that notarized document.*⁵

Bill Harrison – Superintendent of ABSS

- *It was just a slip-up.*⁶
- *While we are certainly disappointed at the athletic and funding losses at Eastern, we appreciate the sheriff's office initiating this investigation which exonerates the administration and athletic department from any purposeful wrongdoing.*⁷

Reaction of ACSO Officers to EAHS Having to Forfeit Games in 2016

Captain Jackie Fortner

- *The school system was blindsided by the documents.*⁸

Kirk Puckett – ACSO Spokesperson

- *The student did nothing wrong in this situation.*⁹

⁵ Ibid.

⁶ The Times-News, Ineligible Eastern Alamance player leads to county, federal investigation, May 16, 2016

⁷ Ibid.

⁸ Ibid.

⁹ Greensboro News, *Student-athlete investigation turns focus on child trafficking and voter fraud*, May 17, 2016.

NEWSPAPER ARTICLES THAT MENTION HINES & HUMAN TRAFFICKING

Between May 16, 2016 and April 9, 2020, Expert has identified 32 news stories that mention human trafficking and Plaintiff Hines's name (Itemized at Attachment B).

Table 4: News stories that include "Hines" and Human Trafficking			
Year	# of news stories that mention Hines & HT	# of times the name Hines appears	# of times Human Trafficking appears
2016	24	224	54
2017	1	3	3
2018	3	31	12
2019	3	14	11
2020	<u>1</u>	<u>5</u>	<u>6</u>
Total	32	277	86

In these 32 news stories, "human trafficking" is mentioned 86 times.

DOCUMENTS REVIEWED BY EXPERT SINCE 9/26/22

Review ACSO Investigation Report 2016-04-212

There are five sections in this report:

1) 4/15/16

Form Title: Incident/Investigation Report

This form was prepared by ACSO Corporal J. G. Harris and ACSO Detective A. Azelton.¹⁰ It states the incident occurred at a residence (address is redacted) and the crimes incidents were:

- No. 1: False Pretense (J102) Felony, and
- No. 2: Offense Against Family Neglect (S101) Misdemeanor.

The reporting person (Redacted) is believed to be Coach Kirby.

Note: NC General Statute § 14-100 defines obtaining property by false pretenses.
NC General Statute § 7B-101 defines child neglect.

2) 4/15/16

Form Title: Preparing Officer Narrative

This form was prepared by ACSO Corporal J.G. Harris, ¹¹ who stated:

EAHS SRO Corporal Harris reported that he was notified by Coach Redacted)(JK) and Assistant Principal Joy Walker of a custody issue involving student Redacted (CJK), who was staying with Redacted (TG). When Redacted (TG) contacted Redacted (Mr. Hines) about health insurance for Redacted (CJK) for a sporting event, Redacted (TG) was advised that there was no insurance.

The Redated (Grates) made some phone calls and were referred to a man named "Franklin" who lived in Raleigh, NC, who advised them to speak to an attorney about custody issues. Franklin told them to make contact with the Embassy to obtain health insurance for Redacted (CJK).

¹⁰ Defense Exhibit A001

¹¹ Defense Exhibit A004

EXHIBIT 1

The Redacted (Grates) informed Corporal Harris that they had been in contact with Redacted (CJK) father who advised them that he wants them to take custody of Redacted (CJK).

Redacted (Brandi Thomason) came to Eastern that morning (April 15, 2016) and spoke with Redacted (identity not known) and put him on the phone with Redacted (Identity not known). Redacted (identity not known) told Coach Redacted (Kirby) that he was told by Redacted (identity now known) that he “was going to screw up everything that he had going.”

A little while later Redacted (Hines) called Coach Redacted (Kirby) and left a voicemail saying that he was going to ruin his career and expose the school for what they are. I advised Coach Redacted (Kirby) not to delete the voicemail.

I made contact with Brian Ireland, ACDSS, and spoke to him about the case. He said that he would make a report and put it through the screening process.

I then spoke with Redacted and Redacted who live at 300 Ben Hogan Drive, Mebane. They advised me that after being in contact with Redacted’s father, he advised them that he would send them a Temporary Custody Agreement.

They (Grates) further were advised by an attorney that the documents for the custody that had been sent were not legal documents in the United States because they had not been filed in court in the United States.

I spoke with Redacted (CJK). He advised me that he did not want to live with the Redacted (Hines).

Section 3 on 4/21/16

Form Title: Case Supplemental Report.

Add here

Section 4 on 5/9/16

Form Title: Case Supplemental Report.

This one page form was prepared by Detective Azelton.¹² It was not approved by a supervisor.

Add here

Section 5 on 7/8/16

Form Title: Case Supplemental Report.

Detective Azelton reported that on July 8, 2016, ACSO consolidated OCA 2016-04-212 (False Pretenses) with OCA 2016-05-082.¹³

Insert Table captioned "Inaccuracies and false statements in these reports."

- **Pending as of January 23, 2023.**

Review ACSO Investigation Report 2016-05-082

There are 26 sections in this report

Add all 26 here **(Pending as of January 23, 2023)**

Insert Table captioned "Inaccuracies and false statements in these reports."

- **Pending as of January 23, 2023.**

Review Deposition of Stefanie Brown Barfield

Pending as of January 23, 2023, include table on inaccuracies and false statements

Review Deposition of Sheriff Johnson

Pending as of January 23, 2023, include table on inaccuracies and false statements

Review Deposition of Sheriff Aundrea M. Azelton

Pending as of January 23, 2023, include table on inaccuracies and false statements

¹² Exhibit A007

¹³ Exhibit A008

ARREST AND SEARCH WARRANT AFFIDAVIT INACCURACIES

Probable cause is a requirement found in the 4th Amendment that must be met before law enforcement make an arrest or conduct a search. Courts usually find probable cause when there is reasonable basis for believing that there is evidence of a crime at a location (for a search) or a crime may have been committed (for an arrest). A review of pertinent ACSO arrest and search warrant affidavits found many inaccuracies.

To Complete (Pending)

- **Arrest Warrant – Hines**
- **Arrest Warrant – Thomason**
- **Search Warrant – Hines Residence**

Search Warrant at 513 S. Maple Street, Graham, NC

Date	Affiant	# of inaccurate statements found
5/13/16	Detective Azelton	17

Facts to Establish Probable Cause

- 1) In the spring of 2014, Hines and Thomason obtained custody of a 14 year old, black male that is using the name Jonathan Chukuemeka Kingsley from Nigeria through an “agent.”
- 2) Jonathan was originally issued a student visa through a private school in Charlotte, which Jonathan never attended.
- 3) A temporary child custody document was signed by Jonathan’s parents, granting custody to Thomason.
- 4) Thomason’s signature was notarized by a Nigerian Notary; however, her passport indicates she has never been to Nigeria.
- 5) The custody agreement is therefore fraudulent, and even if it wasn’t, that agreement does not meet US requirements to transfer custody of a child.
- 6) At the time Jonathan was brought to the US, Hines and Thomason were living at 401 West Holt Street, Graham, where they fraudulently and deceptively enrolled Jonathan in public school at Woodlawn Middle School and signed him up to play on the soccer team, for which they knew he was ineligible.
- 7) The following year, they enrolled Jonathan in Eastern Alamance High School and signed him up to play football and basketball, knowing that he was not entitled to a free and public education and was therefore ineligible to play on the sports team.

EXHIBIT 1

- 8) In January 2016, Hines left the state of NC and went to Oklahoma where he reportedly remained until the end of April.
- 9) No one really knows why he was out of state for so long, but Hines left Jonathan in the care of Timothy and Tyra Grate who have a son that is friends with Jonathan.
- 10) Mrs. Grate has had contact with both Hines and Thomason by using the above listed phone which she provided to me.
- 11) In April, the Grate's and Thomason had a confrontation at Eastern Alamance HS about the Grate's trying to obtain legal custody of Jonathan and subsequently Hines left a voicemail for Mr. Grate as well as Coach Kirby at Eastern, making threats to ruin the school and Coach Kirby's career.
- 12) Hines made his threat good when he returned to NC sometime around the end of April.
- 13) Armed with the knowledge that he had knowingly and deceptively enrolled Jonathan in public school and signed him up for three different school sports teams, Hines filed a complaint with the High School Athletic Association.
- 14) The Association ultimately made Woodlawn and Eastern forfeit all games that were won while Jonathan was a team member of the three sports teams and fined the schools in excess of \$18,000.
- 15) On May 12, 2016, Detectives of the Alamance County Sheriff's Office executed a search warrant at the residence of Aris Hines and Brandi Thomason at 718 Blue Lake Drive, Mebane, NC in Orange County.
- 16) During the course of that search, documentation of a rented storage building was found in the residence and is dated for April 27, 2016.
- 17) The storage building is rented in the name of Brandi Thomason at Cardinal Self Storage located at 513 S. Maple Street, Graham, NC and is listed as Unit D231.
- 18) Based on the previous information provided it is believed that the visa, birth certificates, and educational documentation and supporting documentation will be provided through the search of the storage building.
- 19) In addition to this information, through my training and experience, computers and external storage devices are utilized by persons involved in this type of fraud or related criminal activity and being that the criminal activity is international it can be construed that communication was or is being completed by electronic means and a digital footprint will be in place in electronic devices listed in the items to be seized section of this application.
- 20) In addition, storage buildings are used by persons involved in cheats and frauds to conceal items of evidentiary value.

EXHIBIT 1

21) (Closing with a request to search Unit D231 located at 513 S. Maple Street, Graham, NC)

Sentences with inaccurate or misleading content: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 18, 19, 20.

- **Describe each here (Pending)**

CONCLUSIONS AND OPINION

At this time, the additional records that I reviewed support my opinions of September 26, 2022; however, there still are documents that I have to review, especially those received on January 16, 2023. Expert asked Client on January 16, 2023, for documents that are not redacted.

To date, it is my opinion that:

1. There is no evidence in the ACSO investigation of Plaintiffs that they were engaged in human trafficking or part of an international human trafficking criminal enterprise.
2. There is evidence to believe that ACHS coaching staff and an athletic school booster group unethically tried to keep Jonathan Kingsley in the EAHS Alamance County football program after Mr. Hines moved out of their district, and paid Mr. Hines surreptitiously.
3. There is evidence to conclude that Defendant(s) falsely represented to the public that Plaintiffs were human traffickers or were part of a human trafficking organization that crossed the United States and went overseas, when they were not human traffickers.
4. There is no such description or crime of academic human trafficking, as claimed by Defendant Johnson.
5. From April 2016 through 2017, the ACSO had no properly trained and certified deputies or personnel to effectively and efficiently investigate a complex human trafficking crime.

Add: Supporting data on Conclusions and insert a list of all false statements made by ACSO deputies/officers here.

Respectfully submitted January 16, 2023.

Greg H. Bristol

Greg H. Bristol

ATTACHMENT A: DOCUMENTS RECEIVED AFTER 9/26/22 (LIST)

Insert Attachment A (Excel spreadsheet) after this page

ATTACHMENT B: DOCUMENTS RECEIVED AFTER 9/26/22 (DETAILED)

- a) Resume of Terry Steven Johnson (12 pages)
2. Slides marked *22FT Academy*
 - Three pages
 - Slide marked Bob Collins, Shannon Forest Christian School
 - Slide marked Mike Rawson, 22FT CEO
 - Slide marked Ryan Schmidt, 22FT Head Coach
3. 1427727
 - Date recovered: 4/15/16, by Corporal Harris
 - OCA: 2016-04-212
 - Offense: Student Visa Fraud
 - Contents: CD containing a voicemail
4. 1427728 (Backside of an ACSO evidence envelope)
5. 1427729 (Copy of an ACSO evidence envelope)
 - Date recovered: 4/15/16
 - OCA: 2016-04-212
 - Offense: Student Visa Fraud
 - Contents: Student documents from Eastern High School
6. 1427730 (Backside of an ACSO evidence envelope)
7. 1427731 (CD)
 - Marked "Voicemail from Hines to Mr. Grate"
 -
8. 1427732 (Single clear plastic wrap bag for standard CD)
 - Red ACSO evidence tag sticker, with no descriptive information
9. Celebrity Streetball Facebook rd
 - Appears to be from Facebook.com captioned Celebrity Streetball"
 - Redacted
10. Cole Search Warrant
 - Five pages
 - Issued 5/18/16 addressed to an unnamed financial institution
 - Associated with the 5/12/16 arrest of Aris Hines and Brandi Thomason and the 5/12/16 search warrant execution at 718 Blue Lake Drive in Mebane, NC

EXHIBIT 1

11. 1427733 (Copy of an ACSO evidence envelope and paper contents)
 - School documents, with a cover page captioned “Transfer Information, Jonathan Chukwuemeka Kingsley”
 - Entry 2/3/15 Woodland Middle, exit 6/11/15
 - Entry 8/24/15 Eastern Alamance High, exit 6/9/16
12. AVI file, 953.6 MB, Hines interview 1
 - A. Azelton read Miranda rights
 - Hines states that he does not understand charge
 - Charges: Common Law Obstruction of Justice and OPFP
13. AVI file, 949.6 MB, Hines interview 2
14. Waveform audio, Mebane interview with Aris Hines
15. Adaptive Multi-rate audio (amr), 47 KB, Telephone message re a car warranty
16. AVI file, 949.6 MB, Thomason interview 1
17. Apple MPEG-4 audio, 2.8 MB, Voicemail-79.m4a
18. Investigation/Incident Report
 - Eight pages
 - Case No. 2016-04-212
 - Reported 4/15/16 by J.G. Harris and A. Azelton
 - Assistant Principal Joy Walker, Eastern High School
 - Franklin Manley, mental health facility in Butner
19. Sheriff Reports
 - 52 pages
 - Case No. 2016-05-082
 - Reported 5/6/16 by J.W. Fornter and A. Azelton
20. E.F. Facebook
 - Redacted (unclear whose page it is)
 - 13 pages
 - Print dated 5/19/16
21. Hines CLEAR Report OCR
 - 186 pages, redacted
22. Hines group photo rd (1 page)

EXHIBIT 1

23. J.J. School Paperwork
 - 65 pages
 - Redacted
24. J.K. Mack Academy acceptance letter
 - Two pages
 - Redacted
 - Dated 11/4/14
25. J.K. Facebook rd
 - Four pages
 - Redacted
 - Print date 5/19/16
26. J.K. School Records
 - 32 pages, all redacted
 - Page 1: Eastern Alamance High (term 15-16) transfer information
 - Page 2: Student Enrollment Information, ABSS
 - Page 3: Letter from Orange County Schools
 - Page 4-5: Temporary Custody Agreement
 - Page 6: Student Individual Attendance Report – Woodlawn Middle
 - Page 7: Student Residency Questionnaire related to McKinney-Vento Act
 - Page 10: Certificate of Birth from Nigeria - Redacted
 - Page 15: Document captioned Saint Michael's College, Lagos State
 - Page 16: Woodland Middle School cumulative record audit list
 - Page 18: Report Card June 9, 2015
 - Page 22: Duke Energy receipt, service for Brandi Thomason 1/26/15
 - Page 23: School Due Process Form, 8/25/14
27. Notes rd
 - 3 pages
 - Probably interview notes with Brandi Thomason on 5/19/16
 - Unsigned writer
28. Pictures of E. Mack computer
 - 16 pages
29. Pictures of evidence
 - 9 pages, redacted
 - Pictures of evidence envelopes
30. Report
 - 41 pages, redacted
 - Computer examiner's forensic report

EXHIBIT 1

31. Second Verification Screenshot for Backup
 - 1 page
32. 15-16 LEL policy forms
 - 20 pages
33. 16-17 LEL policy forms
 - 20 pages
34. A – ACSO Investigation Report
 - Eight pages (2.8 MB)
 - Case No. 2016-04-212
 - Redacted
35. B – ACSO Sheriff's Report
 - 52 pages (18.4 MB)
 - Case No. 2016-05-082
36. doc 113018 – 1
 - Two pages
 - Interview notes: Edward Alaka via Skype by Sgt. Cobb & Sgt. McPherson
37. doc 113018 – 001
 - 26 pages
 - Arrest report of Aris Hines on 5/12/16 by ACSO
 - Warrant for arrest
38. doc 113018 – 003
 - 14 pages
 - Arrest report of Brandi Thomason on 5/12/16 by ACSO
 - Warrant for arrest
39. doc 113018 – 007
 - 41 pages
 - Draft ACSO Press Release 5/13/16 "Suspects arrested on OOJ and OPFP
 - ACSO News Release, press conference 5/16/16
 - Newspaper articles starting in 2009
 - 2011 KSWO, Lawton, OK re Hines in WV

EXHIBIT 1

40. doc 113018 – 012

- 32 pages

- P 1 NC Safety Assessment 4/18/16 of Timothy and Tyra Grate (Form DSS-5231)
- Section 1: Line 12, ACSO investigating Hines for illegal placement
 - Section 2: Grate's agree to provide care for CJK
 - Section 3: Safety Decision
- P 6 Fax 4/18/16 from Vosburg to M. Bridges, Superintendent, ABSS
- P 7 To whom it may concern letter April 14, 2016 "This office has been retained to begin a custody action in Alamance County to obtain custody of the minor child, CKJ.
- P 9 4/26/16 Affidavit of Timothy Grate and Tyra Grate, Mebane, NC
- Form AOC-G-250
 - 1) I have used the Servicemembers Civil Relief Act Website to determine the defendant's military status
 - General Court of Justice, Alamance County, NC
 - Grate v. Edward Chukwuma Alaka (Defendant)
 - Court stamp 4/27/16
- P12 Civil Summons, The General Court of Justice, District Court Alamance County
- Filed (Stamped) 4/27/16
 - You are to appear
- P13 Complaint for Custody (Signed 4/25/16)
Plaintiffs allege:
- 1) They are residents of Alamance Co
 - 2) Defendants are residents of Nigeria
 - 3) The minor child's DOB is 4/28/01, and he has been in the US since 12/16/14 and was residing in Alamance County with Brandi Thomason under a written agreement.
- Exhibit A A copy of the birth certificate
- Exhibit B A copy of the written agreement with Thomason
- Exhibit C Defendants revoked their written agreement with Thomason in that that minor child no longer wanted to reside with her.
- P15 Child Custody
Claim for Relief: Child Custody. An affidavit as to the status of the minor child is attached (Exhibit D). His DOB is 4/28/01.
- P16 Affidavit as to Status of Minor Child
4/21/16 by Timothy Grate and wife

41. doc 113018 – 014

- 16 pages
- Interview notes of Aris Hines
- Information on his students:
 - BC USA
 - BF Canada
 - DA Canada
 - JE Canada
 - JJ NC
 - JM Canada
 - MA Sudan
 - ML Canada
 - MM Canada
 - NH Canada
 - PR Canada
 - RT Senegal
 - SO Nigeria
 - TS Canada
 - YM Senegal
- Students enrolled at Burlington Christian Academy August 2012 – Oct 2012
 - BC USA
 - BF Canada
 - JE Canada
 - ML Canada
 - MM Canada
 - NH Canada
 - PR Canada
 - RT Senegal
- Letters from Burlington Christian Academy to Hines
 - August 14, 2012
 - September 4, 2012
- Burlington Christian Academy letters
 - September 28, 2012, to parents
 - October 26, 2012, to NCAA Compliance Center

42. doc 113018 – 015

- Nine pages
- Official Non-Public School Registration Record: William Christian Academy, Mebane
- Burlington Christian Academy letters
 - October 5, 2012, to Parents
 - October 26, 2012, to NCAA Compliance Center
- Evelyn Mack Academy letter November 4, 2014 to CKJ (Congratulations)

EXHIBIT 1

43. Transcript of a recording between Aris Hines and Tim Grate
 - 4 pages
44. Transcript of ACSO interview of Jonathan Kingsley on May 18, 2016
 - 45 pages
 - His DOB is April 28, 2001
 - I attend Eastern Alamance High School
 - His middle name is Chukwuemeka
 - He likes to be called Jonathan, my last name
 - His birth certificate says Kingsley Chukwuemeka Jonathan
 - Back in Nigerian a scout named Leo approached him
45. Sheriff Johnson 12-9-2022 (recording at press conference)
 - 44 pages
 - Transcript of video recording of Sheriff Johnson Press Conference
46. Sheriff's Bond 15-16 (002)
 - Three pages
 - NGM Insurance Company
47. Depo Johnson
 - 81 pages
 - Deposed on November 23, 2022
48. Depo Azelton
49. Depo Barfield

ATTACHMENT C: NEWS ARTICLES THAT MENTION HINES & HUMAN TRAFFICKING

Insert Attachment C (Excel spreadsheet) after this page

ATTACHMENT D: CV

Insert CV after this page

ATTACHMENT E: COMPENSATION RATE

Retention Agreement July 16, 2022

Compensation Rate:

- a) Remote research, review, consultation, and in-person deposition or trial testimony (billed in quarter-hour increments) with non-working travel time billed at 50% of the hourly rate: \$325/hour. 50 hour cap without written authorization.
- b) Travel costs for in-person trial testimony (hotel, meals, parking, taxi): actual cost.
- c) Personal automobile at GSA rate per mile, coach class (Y) for direct non-stop air travel, plus all other customary expenses: Actual cost

Amended Retention Agreement November 21, 2022

- a) Hourly rate remains \$325/hour.
- b) If Client is unable to pay, Expert agrees that any hours Expert worked post Invoice No. 1 will be considered Pro Bono.